

AUG 10 2022

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

DOLORES SHARPE,

X

Plaintiff,

-against-

COUNTY OF NASSAU, NASSAU COUNTY  
POLICE DEPARTMENT, CHARLES VOLPE, in  
his individual and official capacities, VICTOR  
GLADITZ, in his individual and official capacities  
and former Police Commissioner THOMAS DALE,  
in his individual and official capacities,

Defendants.

X

TO: Frederick Brewington, Esq.  
Law Offices of Frederick K. Brewington  
Attorneys for Plaintiff  
556 Peninsula Blvd.  
Hempstead, New York, 11550

**PLEASE TAKE NOTICE** that Defendant County of Nassau, pursuant to Federal Rule of Civil Procedure 68, hereby offers to allow judgment to be entered against it in this action in the amount of six hundred and fifty thousand dollars (\$650,000), inclusive of reasonable attorneys' fees accrued through the date of Plaintiffs' acceptance of this offer, to be paid by the County in full and final resolution of all claims and issues raised in Plaintiffs' complaint and asserted against the Defendants, including but not limited to attorneys' fees and costs.

This offer, and any judgment taken from it, is conditioned upon Plaintiff's acceptance and shall be in full satisfaction of all federal and state law claims and/or rights that Plaintiff may have to damages, and any other form of relief, arising out of the alleged acts or omissions of Defendants, and any employees, agents, either past or present, of the County of Nassau, any

LAW OFFICES OF  
FREDERICK K. BREWINGTON

CV-15-6446 (HG)(AYS)

**OFFER OF JUDGMENT  
PURSUANT TO FED. R. CIV. P. 68**

agency or department thereof, in connection with the facts and circumstances that are the subject of this action or which could have been brought in this action.

This offer is made solely for the purposes specified in Federal Rule of Civil Procedure 68 and is not to be construed as an admission of fault or liability on the part of any Defendant, official, employee, or agent of the County of Nassau, any agency or department thereof, nor is it an admission that Plaintiff has suffered any damages.

Acceptance of this Offer of Judgment will act to release and discharge all Defendants in this action; their successors and assigns; and all past and present officials, employees, representatives, and agents of the County of Nassau, including but not limited to Thomas Dale, Charles Volpe and Victor Gladitz, from any and all claims that were or could have been alleged by Plaintiff arising out of the facts and circumstances that are the subject of this action.

Acceptance of this Offer of Judgment will also operate to waive any claim that Plaintiff may have to interest on the amount of any judgment resulting therefrom.

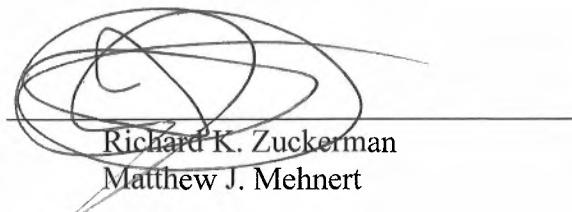
Acceptance of this Offer of Judgment must be made in writing no later than 14 days after the Offer has been made.

Any judgment taken from this Offer of Judgment shall contain and recite the terms and conditions set forth herein.

Dated: Melville, New York  
August 9, 2022

Yours, etc.  
LAMB & BARNOSKY, LLP

By:



Richard K. Zuckerman  
Matthew J. Mehnert

Attorneys for Defendants County of Nassau, Nassau  
County Police Department and Thomas Dale  
534 Broadhollow Road, Ste. 210  
P.O. Box 9034  
Melville, New York 11747-9034  
(631) 414-5808

cc: SOKOLOFF STERN, LLP  
Steven Stern, Esq.  
Attorneys for Defendant Charles Volpe  
179 Westbury Avenue, 2<sup>nd</sup> Floor  
Carle Place, New York 11514  
(516) 334-4500

MONTFORT, HEALY, MCGUIRE & SALLEY, LLP  
James Murphy, Esq.  
Attorneys for Defendant Victor Gladitz  
840 Franklin Avenue  
P.O. Box 7677  
Garden City, New York 11530  
(516) 747-4082

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

DOLORES SHARPE,

X CV-15-6446 (HG)(AYS)

Plaintiff,

-against-

COUNTY OF NASSAU, NASSAU COUNTY  
POLICE DEPARTMENT, CHARLES VOLPE, in  
his individual and official capacities, VICTOR  
GLADITZ, in his individual and official capacities  
and former Police Commissioner THOMAS DALE,  
in his individual and official capacities,

Defendants.

STATE OF NEW YORK )  
                        )  
                        ) ss.:  
COUNTY OF SUFFOLK )

FRANCES LAZZARO, being duly sworn deposes and says:

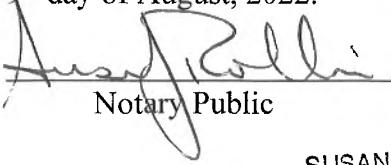
I am not a party to the within action. I am over 18 years of age and reside in West Babylon, New York.

That on August 9, 2022, I served a copy of the **Offer Of Judgment Pursuant To Fed. R. Civ. P. 68**, by depositing a true copy of same enclosed in a properly addressed wrapper as shown below, into the custody of Federal Express for overnight delivery, prior to the latest time designated by that service for overnight delivery, addressed to:

Frederick Brewington, Esq.  
Law Offices of Frederick K. Brewington  
Attorneys for Plaintiff  
556 Peninsula Blvd.  
Hempstead, New York 11550

  
\_\_\_\_\_  
FRANCES LAZZARO

Sworn to before me this  
9<sup>th</sup> day of August, 2022.

  
\_\_\_\_\_  
Notary Public

SUSAN J. ROLLINS  
Notary Public State of New York  
No. 01RO6112024 - Suffolk County  
Commission Expires June 28, 2024